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HRS DOCUMENTATION RECORD
for
Rogers Delinted Cottonseed Co.

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Austin, Texas

January 15, 2002

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*Protecting Texas
by Reducing and
Preventing Pollution*

HAZARD RANKING SYSTEM DOCUMENTATION RECORD

for

**Rogers Delinted Cottonseed Company
TXD981055486
Farmersville, Collin County, Texas**

Prepared by:

**Texas Natural Resource Conservation Commission
Superfund Site Discovery and Assessment Program
Austin, Texas**

January 2002

HRS
Documentation Record

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HRS DOCUMENTATION RECORD

Rogers Delinted Cottonseed Company

FARMERSVILLE, COLLIN COUNTY, TEXAS

SIGNATURE PAGE

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Texas Natural Resource Conservation Commission
Superfund Site Discovery and Assessment Program
Project Manager
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Section Manager
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Attachment - Site Photographs

HRS DOCUMENTATION RECORD - REVIEW COVER SHEET

SITE NAME: Rogers Delinted Cottonseed Company

CONTACT PERSON:

Documentation Record: Susy Loftus - TNRCC Project Manager 512/239-2944

PATHWAYS OF CONCERN:

Soil Exposure Pathway

Releases of hazardous substances to the soil exposure pathway are the major concern for this site. Hazardous substances have been documented in the soil at the site. The Soil Exposure Pathway is being scored based on the actual contamination and potential contamination.

PATHWAYS, COMPONENTS, OR THREATS NOT EVALUATED:

Ground Water Pathway

The Ground Water Pathway was not evaluated because the inclusion of this pathway would not significantly affect the score. The closest drinking water well was located approximately 1-1/4 miles from the site.

Surface Water Pathway

The Surface Water Pathway was not evaluated because no perennial surface water body exists within two miles of the site. The Drinking Water Exposure Pathway was not evaluated because the inclusion of this pathway would not significantly affect the score. The Human Food Chain Exposure Pathway was not evaluated because the inclusion of this pathway would not significantly affect the site score.

Air Migration Pathway

The Air Migration Pathway was not evaluated due to the lack of an observed release and because the inclusion of this pathway would not significantly affect the site score.

(Although these pathways have not been evaluated, the TNRCC is concerned for all pathways surrounding the site. However, evaluation of these pathways would not have significantly increased the overall site score.)

NOTES TO THE READER

The following rules were used when citing references in the HRS Documentation Record:

1. All references attached to this report have been stamped with a designated page number (example: Ref. 1, p. 10 = 001 00010). However, if the reference being cited has an original page number, that page number was cited. If the reference being cited has no original page number or the pagination is not complete, then the designated page number is cited.
2. The State predecessor agencies: Texas Water Quality Board (TWQB), Texas Department of Water Resources (TDWR), Texas Water Commission (TWC), and Texas Air Control Board (TACB), referred to throughout this report are now known as the Texas Natural Resource Conservation Commission (TNRCC). The new agency, TNRCC, became effective September 1, 1993, as mandated under State Senate Bill 2 of the 73rd Regular Legislative Session.

HRS DOCUMENTATION RECORD

Name of Site: Rogers Delinted Cottonseed Company

Date Prepared: 1/02

Site Owner: Yazaki U.S. Corporation

Site Contact: Koshiro Yazaki, President, Yazaki U.S. Corporation
(214) 559-2424
3131 Turtle Creek, Suite #301
Dallas, Texas 75219

Location of Site: State Highway (SH) 380 and Farm to Market (FM) 547

City, County, State: Farmersville, Collin County, Texas

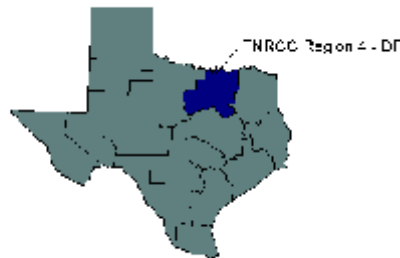
General Location in the State: (see Figure 1, Site Location Map).

Topographic Map(s): US Geological Survey 7.5 Minute Topographic Map, Farmersville

Latitude: 33E 09' 18.74" North

Longitude: 96E 19' 46.93" West

TNRCC Region: 4



Pathway Scores:

Ground Water Migration Pathway - NE

Surface Water Migration Pathway - NE

Soil Exposure Pathway - 10.2

Air Migration Pathway - NE

(NE - Not Evaluated)

Figure 1

.....

SITE SUMMARY

General Description of the Site:

The Rogers Delinted Cottonseed Company (RDCC) site is an abandoned cottonseed delinting processing facility located approximately one mile east of Farmersville at the intersection of SH 380 and FM 547 in Collin County, Texas (see Figure 1, Site Location Map). The approximate geographic coordinates of the site are latitude 33E 09' 18.74" N and longitude 96E 19' 46.93" W.

The site consists of an 81 acre tract as described in the SMALLWOOD OWENS SURVEY, Abstract No. 678, and recorded in the deed from Calvin Douglas, et ax, to J. L. Uland, et ax, dated October 12, 1962. The site was divided into four parcels with three separate owners sometime after RDCC stopped operations at the facility. The original buildings and impoundments are on approximately 10 acres currently owned by the Yazaki U.S. Corporation. The Yazaki U.S. Corporation owns 100 percent of the capitol stock of RDCC. The corporation has declared bankruptcy and the site is abandoned. A deed dated February 1, 1985 shows Dalwest Properties as the owner of 69 acres. On September 27, 1993, Singing Properties JV purchased the 69 acres, subsequently selling two parcels of 5 and 15 acres to Step of Faith Worship Center on April 27, 1999. (Ref. 5).

The cottonseed delinting facility operated from 1965 to 1984 and is currently abandoned. A former processing building, office, and silo structures are located on the property, along with two inactive surface impoundments. Security fences around the impoundments and processing building were installed during Fiscal Year 2000 by TNRCC State contractors (Ref. 6).

Site History:

The company began delinting operations in 1965, and submitted registration as an industrial solid waste management site to the Texas Water Quality Board (TWQB) on August 11, 1973 (Ref. 7). The company subsequently applied for a wastewater discharge permit on April 23, 1974, that was publically reviewed on November 14, 1974, and approved (Permit #01898) by the TWQB on February 25, 1975 (Ref. 8). The company had constructed two surface impoundments to manage corrosive wastewaters (5% dilute sulfuric acid) from the cottonseed delinting process. These wastewaters gravity-flowed from the processing area through an underground PVC line to Pond #1 (see Figure 2), which was used as a primary settling basin to collect husks, lint and other particulate matter. Wastewater from Pond #1 gravity discharged through an 8-inch diameter plastic pipe to Pond #2, which was used as a secondary settling basin and evaporation pond. The permit specified wastewater discharge from the ponds was to be accomplished only by natural evaporation and by irrigation to the adjacent fields using rainfall mixture dilution (Ref. 8).

In July 1973, the TWQB District 4 Office conducted a site investigation in response to a Texas Park & Wildlife reported spill of dilute sulfuric acid discharging along 4 miles of Brushy Creek and a tributary located east of the RDCC facility. Results of the investigation documented the presence of low pH runoff at a distance of 0.25 miles from the site that had been inadvertently pumped from the on-site wastewater ponds to an unnamed tributary draining into Brushy Creek (Ref. 9).

Subsequent District 4 inspections on November 20, 1973 and January 21, 1974 noted Pond #1 was nearly full of lint and other settled solids, and a pump on the west side of Pond #2 was used to
Figure 2

irrigate the adjacent fields. Waste sludge from Pond #1 was reported dredged by backhoe and transported to the City of Farmersville sanitary landfill when the pond became full. According to the plant operations manager, Mr. A. D. Cook, processed cottonseeds were treated with a fungicide and a pesticide after the seeds were delinted (Ref. 10).

On August 21, 1974, the TWQB District 4 Office investigated an anonymous citizen's complaint referred by the EPA Region 6 Office concerning a contaminated stormwater discharge from sulfuric acid allegedly poured on the ground surrounding Pond #1. The complainant stated there had been numerous fishkills in Brushy Creek and the most recent one had occurred on August 14, 1974. The complaint could not be substantiated; however, during the investigation, it was noted that there were ponds of water in the creek containing minnows (Ref. 11). Soil samples were obtained from each of the impoundments and from the irrigated field during an April 6, 1984 TDWR inspection. Lab results from the samples indicated a total arsenic level of 0.88 mg/kg in the sample from Pond #1. Total arsenic analysis results were not included from the Pond #2 sample; however, arsenic EP toxicity results were 345 ug/l. The two samples from the irrigated field had total arsenic concentrations of 6.09 mg/kg and 4.72 mg/kg. Facility personnel stated that the southwest field had not been planted or irrigated during the last year. During the sampling inspection, the District 4 inspector was informed by facility personnel that both fields had been used to grow cotton. It was revealed that an arsenic-based chemical was used to defoliate the plants when the cotton was harvested (Ref. 12).

The facility was subsequently submitted for enforcement to the Texas Water Commission (TWC) Central Office based on results of the March 14 and April 6 inspections and a November 4, 1985 Compliance Evaluation Inspection (CEI) conducted by a District 4 inspector and a TWC Central Office Enforcement staff member. Liquid samples collected during the inspection from the edge of each pond revealed low pH values of less than 1.0, which were determined hazardous. The site was no longer in operation.

A civil administrative penalty of \$8,599.00 was assessed on April 15, 1987 for failure to close and failure to submit financial assurance. On July 14, 1987, representatives of RDCC negotiated an Agreed Order with the Commission specifying the following conditions (Ref. 13):

- (1) payment of \$599.00 in penalties (deferring the balance upon completion of closure), (2) completing closure before August 27, 1987 (45 days from date of Order), (3) submitting and implementing (within 60 days from receiving soil analysis results) a soil investigation work plan, (4) installing a groundwater monitoring program, (5) properly posting the site, (6) notifying the District 4 Office of any closure activity; and, (7) securing financial assurance if post-closure care is required.

On August 7 and 28, 1987, a TWC District 4 inspector conducted a sampling and case development inspection at RDCC to determine compliance with the TWC Agreed Order. Results of the inspections indicated (Ref. 14):

1. Analysis of a soil and liquid sample collected from the west end of Pond #2 indicated low concentrations of four (4) acid extractable semi-volatile organics, an unidentified sulfur compound, and five (5) unidentified organic peaks in the liquid sample. Three (3) unidentified semi-volatile organic compounds were detected in the sludge sample.

2. It was noted the company had not completed closure as of September 25, 1987, a soil investigation plan had not been developed and submitted, and proper posting had not been accomplished.

Subsequent inspections by the TWC District 4 Office on February 12, 1988 and January 17, 1989; and, an EPA Preliminary Assessment (PA) reconnaissance inspection on May 14, 1988 noted that site conditions had not significantly changed since the December 2, 1986 TWC inspection (Ref. 3).

On March 15, 1988, the site was referred to TWC enforcement for failure to close. When the company failed to respond to two TWC Notice of Violation (NOV) letters, the site was referred to the EPA for enforcement on November 30, 1988. When enforcement efforts by both the EPA and the Department of Justice (DOJ) resulted in no further action by representatives of RDCC, the site was subsequently transferred to the EPA Superfund Program.

On March 18, 1992, the EPA Region VI Office notified the TWC Central Office that it was closing its enforcement file on the site and referring the site back to the State for further action (Ref. 15).

During the September 23, 1993 TNRCC Region 4 complaint investigation, numerous drums of leaking pesticides were noted located in the north end of the former processing building. A total of seven (7) drums were subsequently overpacked and removed, and a spill area on the concrete floor remediated. During the investigation, strong pesticide odors were noted in the soils between the two buildings, where liquids from the corroded drums may have spilled when the drums were apparently moved. The following conditions were observed (Ref. 16):

1. Stored within the former processing building were: four (4) full to partially full, upright 55-gallon drums (one noted corroded); three (3) overturned, leaking 55-gallon drums with a stained area approximately 10' in diameter on the concrete floor surrounding the drums; and, one (1) open 5-gallon and three (3) capped 1-gallon glass containers containing a red-brown liquid. The drums contained the insecticide "THIMET", containing phorate (listed extremely hazardous substance), and a fungicide "VITAVAX-200", containing carboxin and thiram.
2. There were numerous empty containers and drums, many of them unmarked, stored on pallets in the south end of the processing building.
3. Information provided by a former employee revealed that when the plant ceased operations, remaining insecticide and fungicide drums were placed in the warehouse. The drums had been moved to the processing building sometime prior to the investigation. Strong pesticide odors were noted on the ground between the two buildings where liquids may have been spilled when the corroded drums were moved.
4. Farm equipment was noted stored in the warehouse. During the investigation, it was revealed that local ranchers had used the warehouse as a storage area from the time the company had vacated the property.
5. The leaking and open drums were containerized by a State emergency response contractor on

September 23, 1993. The 10' diameter stained area inside the processing building was washed using a water, bleach, and isopropyl alcohol solution, and absorbent applied. The building was secured using a locked chain.

From September 1993 to March 1994, the remaining drummed pesticide wastes were removed by the respective manufacturers at the request of the TWC District 4 Office. On January 16, 1995, the remainder of the drummed (overpacked) glass containers containing the red-brown acid liquid, decontamination material, and absorbants were removed from the site for characterization and disposal.

The information used to identify the waste characteristics at the RDCC site was obtained from a review of both federal and state records. The site was identified to have multiple waste sources, where hazardous substances had been stored, deposited, or disposed, plus soils that may have become contaminated from migrating hazardous substances. A record review identified the following known hazardous materials generated or stored at the site:

- Spent sulfuric acid rinsewaters from processing cottonseeds
- Arsenic-based chemicals applied to defoliate cotton plants
- Pesticides (containing phorate, carboxin, and thiram) spilled on-site

A Screening Site Inspection was performed in 1995 by SSDAP under the multi-site cooperative agreement with the U.S. Environmental Protection Agency. The specific areas investigated where hazardous substances were either used, stored, or spilled include: (1) the two inactive surface impoundments, which had been used as evaporation and irrigation ponds for spent acid rinsewaters (dilute sulfuric acid, 5% solution), (2) two 15,000-gallon above-ground sulfuric acid storage tanks located at the southeast corner of the processing building, (3) the pesticide drum storage areas located in the north end of the processing building and, in the former warehouse, (4) the seed storage silo area, (5) the irrigation fields located south and east of the processing area, and (6) the tail-water pit located in the northeast corner of the property. Nineteen soil/sediment samples were collected during the SSI to evaluate the surface water and soil exposure pathways. Analytical results for sediments indicated that there was no apparent release of on-site contaminants to the surface water pathway. Soil sample analytical results documented that dieldrin, aroclor 1254 and 1260, arsenic, cadmium, copper, lead, selenium, and zinc were present in concentrations at least three times background levels. Arsenic concentrations onsite ranged from 4.7 mg/Kg to 23.7, none of which were three times background levels. One sample was taken from the irrigated cotton fields located south of the main facility that contained an arsenic concentration at a concentration of 27 mg/Kg, which exceeds three times background (Ref. 17). The USEPA-Region 6 Office issued a Superfund Site Strategy Recommendation of "No Further Remedial Action Planned" (NFRAP) and referred the site to the State in December 1995 (Ref. 18).

The installation of security fences around the surface impoundments and former processing building (production warehouse) was completed by a contractor hired by the TNRCC in February 2000. In order to determine if further immediate removal activities were required, additional investigation was performed in March 2000. The first objective of the activities was to determine if stormwater was entering the

processing building, coming into contact with the contamination inside, and then washing contaminants into Pond #1. The second objective was the determination and disposal of the contents of the aboveground storage tanks (ASTs) on the site. Thirty (30) gallons of diesel fuel from the tanks was disposed of on June 7, 2000 (Ref. 19).

Additional soil samples were taken in July 2001, in order to further evaluate the potential for exposure to nearby residents to elevated arsenic concentrations. Soil samples were taken from the two closest residential yards (SO-1, SO-2, and SO-3) along with two background samples (SO-4 and SO-5) from presumably unaffected areas (see Figure 3). The analytical results did not indicate arsenic levels above detection limits (Ref. 20). However, during field activities, it was noted that a new facility was being constructed by a church within the former irrigated cotton fields. The Step of Faith Church representative Ms. Becky Sims was contacted regarding ownership and plans for the property. Ms. Sims indicated that the church had purchased twenty (20) acres and that a church and private school would be operated on the property. Classes were anticipated to begin at the facility in 2002, therefore the soil exposure pathway needed to be re-evaluated. Samples were taken in August 2001 from the property owned by the church and planned for future recreational use by the school (Ref. 21). A documented release of 25 mg/Kg, at least three times background and above Texas Risk Reduction Program protective concentration level for arsenic, was documented in soil sample SO-8 (Ref. 22). Therefore, the site hazard ranking score was based upon the soil exposure pathway that exists for the workers and students at the church and private school facility.

Figure 3

REFERENCES

- | <u>Reference Number</u> | <u>Description of the Reference</u> |
|-------------------------|--|
| 1. | U.S. Environmental Protection Agency, 40CFR Part 300, <i>Hazard Ranking System</i> , Appendix A, 55 FR 51583, December, 1990. |
| 2. | U.S. Environmental Protection Agency, <i>Superfund Chemical Data Matrix (SCDM)</i> . June, 1996. |
| 3. | U.S. Environmental Protection Agency. <u>Preliminary Assessment For Rogers Delinted Cottonseed Co., near Farmersville, Texas</u> , CERCLIS #TXD981055486, March 24, 1989. 9 pages w/attachments. |
| 4. | U.S. Geological Survey, Farmersville, Tx Quadrangle, 7.5-Minute Series. <u>Topographic Map</u> . 1962. 1 page. |
| 5. | Collin County Appraisal District records and SMALLWOOD OWENS SURVEY, Abstract No. 678, as described in deed from Calvin Douglas, et ax, to J. L. Uland, et ax, dated Oct 12, 1962 and recorded in Vol. 606, pg 256 of the Collin County Deed Records. 16 pages. |
| 6. | Leigh Engineering, Inc. Field Activity Report for Fencing and Securing of Superfund Site. February 3, 2000. 10 pages w/attachments. |
| 7. | Texas Water Quality Board, <u>Application for Registration, Industrial Solid Waste Management Site</u> submitted by Joe H. Snapp, Operations Manager, Rogers Delinted Cottonseed Co., Farmersville, Texas, dated August 11, 1973. 9 pages/w supplements. |
| 8. | Texas Water Quality Board, <u>Application for Waste Control Order Under Provisions of Article 7621d-1, Vernon's Texas Civil Statutes</u> submitted by Joe H. Snapp, Ops Mgr, Rogers Delinted Cottonseed Company, Farmersville, Texas, dated 4/22/74. 2 pages. |
| 9. | Texas Water Quality Board, <u>Oil, Sewage or Hazardous Materials Accidental Discharge or Spill Report</u> investigation conducted by Barry A. Smith, TWQB District 4 Inspector, dated July 30, 1973. 5 pages. |
| 10. | Billy Roy Smith, Engineering Technician, Texas Water Quality Board, District 4, Industrial Solid Waste Disposal Site Inspection report, November 20, 1973. 4 pages. |
| 11. | Collins I. Hurley, P.E., Field Investigator, Texas Water Quality Board, District 4, letter to Files, District 4, August 22, 1974. Re: Rogers Delinted Cottonseed Company, Collin County, results of complaint investigation, conducted August 21, 1974. 2 pages. |
| 12. | Jenny G. Menard, Texas Department of Water Resources, District 4, letter to Bryan Dixon, Chief, Solid Waste and Spill Response Section, June 11, 1984. Re: Rogers Delinted |

- Cottonseed Company - Farmersville, Texas, No Registration, Results of Sampling Inspection, conducted April 6, 1984. 2 pages w/attachments..
13. Mary A. Hefner, Chief Clerk, Texas Water Commission, Austin, letter to Mr. Koshiro Yazaki, July 16, 1987. Re: Rogers Delinted Cottonseed Company, Registration No. 33368, Commission Agreed Order, dated July 14, 1987. 1 page w/attachments.
 14. Gerardo H. Garcia, Environmental Quality Specialist, Texas Water Commission, District 4, letter to Samuel Pole, IV, Section Chief, Enforcement Section, Hazardous and Solid Waste Division, October 29, 1987. Re: Rogers Delinted Cottonseed Company - Farmersville, Texas, SWR 33368, Sampling and Case Development Inspection, conducted 7/7 and 7/28/87. 2 pages w/attachments.
 15. Agatha L. Bell Benjamin, P.E., Texas Section (6H-CT), Environmental Protection Agency, Region VI, Dallas, memorandum to File. Re: Referral - Rogers Cottonseed Company, Farmersville, TX., TXD981055486, dated March 18, 1992. 2 pages.
 16. James D. Thompson, Investigator, Texas Natural Resource Conservation Commission, Region 4, October 5, 1993. Re: Rogers Delinted Cottonseed Company; Investigation Report, conducted 9/23/93. 3 pages w/attachments.
 17. U.S. Environmental Protection Agency. Screening Site Inspection for Rogers Delinted Cottonseed Company, EPA #TXD9810554886, Farmersville, Texas, August 1995.
 18. Leigh Engineering , Inc. Field Activity Report for AST Fluid Identification and Stormwater/Wastewater Evaluation. May 2, 2000.
 19. U.S. Environmental Protection Agency. Superfund Site Strategy Recommendation - Region 06. December 11, 1995. 2 pages.
 20. Lower Colorado River Authority, Final Analysis Report, August 2, 2001.
 21. Susy Loftus, telephone conversation records with Becky Sims, August 7 and September 19, 2001, and planned facilities map. 3 pages.
 22. Lower Colorado River Authority, Final Analysis Report, September 5, 2001.

WORKSHEET FOR COMPUTING HRS SITE SCORE

S

1. Ground Water Migration Pathway Score (S_{gw}) NE
(from Table 3-1, line 13)
- 2a. Surface Water Overland/Flood Migration NE
Component (from Table 4-1, line 30)
- 2b. Ground Water to Surface Water Migration NE
Component (from Table 4-25, line 28)
- 2c. Surface Water Migration Pathway Score (S_{sw}) NE
Enter the larger of lines 2a and 2b as the
pathway score.
3. Soil Exposure Pathway Score (S_s) 18.13
(from Table 5-1, line 22)
4. Air Migration Pathway Score (S_a) NE
(from Table 6-1, line 12)
5. Total of $S_{gw}^2 + S_{sw}^2 + S_s^2 + S_a^2$ 328.8
6. **HRS Site Score** Divide the value on line 5
by 4 and take the square root. 9.1

**TABLE 5-1
SOIL EXPOSURE PATHWAY SCORESHEET**

<u>Factor Categories and Factors</u>	<u>Maximum Value</u>	<u>Value Assigned</u>
RESIDENT POPULATION THREAT		
<u>Likelihood of Exposure</u>		
1. Likelihood of Exposure (Ref. 1, Sect. 5.2.1.1, Ref. 21)	550	<u>550</u>
<u>Waste Characteristics</u>		
2. Toxicity (Ref. 1, Sect. 5.1.2.1 and Ref. 2)	*	<u>10,000</u>
3. Hazardous Waste Quantity (Ref. 1, Sect. 2.4.2.2, Ref. 21)	*	<u>100</u>
4. Waste Characteristics (Ref. 1, Sect. 5.1.2.3)	100	<u>32</u>
<u>Targets</u>		
5. Resident Individual (Ref. 1, Sect. 5.1.3.1)	50	<u>50</u>
6. Resident Population:		
6a. Level I Concentrations (Ref. 1, Sect. 5.1.3.2.1, Ref. 21 and 22)	**	<u>30⁺⁺</u>
6b. Level II Concentrations	**	<u>0</u>
6c. Resident Population (Lines 6a + 6b)	**	<u>30</u>
7. Workers (Ref. 1, Sect. 5.1.3.3, Ref. 21)	15	<u>5</u>
8. Resources	5	<u>0</u>
9. Terrestrial Sensitive Environments	***	<u>0</u>
10. Targets (Lines 5 + 6c + 7 + 8 + 9)	**	<u>85</u>
<u>Resident Population Threat Score</u>		
11. Resident Population Threat (Lines 1 x 4 x 10)	**	<u>1,496,000</u>
<u>NEARBY POPULATION THREAT</u>		
<u>Likelihood of Exposure</u>		
12. Attractiveness/Accessibility (Ref. 1, Sect. 5.2.1.1)	100	<u>75</u>
13. Area of Contamination (Ref. 1, Sect. 5.2.1.2)	100	<u>5</u>
14. Likelihood of Exposure (Ref. 1, Sect. 5.2.1.3)	500	<u>25</u>

* Maximum value applies to waste characteristics category

** Maximum value not applicable

*** No specific maximum value applies to factor. However, pathway score based solely on terrestrial sensitive environments is limited maximum of 60

+ Minimum value of 100 if any target is exposed to Level I or Level II contamination

++ In preparing the HRS scoring package for the Rogers Delinted Cottonseed Co. site in Farmersville, a quantity of three (3) was used for the number of resident individuals in order to obtain a conservative score for the site. The church and private school is currently under construction. The estimated date for occupying the facility is January 2002. It is not known when the entire facility will be opened.

**TABLE 5-1
SOIL EXPOSURE PATHWAY SCORESHEET**

Factor Categories and Factors

**Maximum Value
Value Assigned**

NEARBY POPULATION THREAT (Concluded)

Waste Characteristics

15.	Toxicity (Ref. 1, Sect. 5.2.2.1, Ref. 2)	*	<u>10,000</u>
16.	Hazardous Waste Quantity (Ref. 1, Sect. 5.2.2.2)	*	<u>10</u>
17.	Waste Characteristics (Ref. 1, Sect. 5.2.2.3)	100	<u>18</u>

Targets

18.	Nearby Individual (Ref. 1, Sect. 5.2.3.1)	1	<u>0</u>
19.	Population Within 1-Mile (Ref. 1, Sect. 5.2.3.2)	**	<u>0.16</u>
20.	Targets (Lines 18 + 19)	**	<u>0.16</u>

Nearby Population Threat Score

21.	Nearby Population Threat (Lines 14 x 17 x 20)	**	<u>72</u>
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SOIL EXPOSURE PATHWAY SCORE

22.	Soil Exposure Pathway Score *** (S ₃)(Lines 11 + 21)/82,500, subject to a maximum of 100)	100	<u>18.13</u>
-----	--	-----	--------------

- * Maximum value applies to waste characteristics category
- ** Maximum value not applicable
- *** No specific maximum value applies to factor. However, pathway score based solely on terrestrial sensitive environments is limited maximum of 60
- **** Do not round to the nearest integer